

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

MARIE TOOLE AND)
CHRIS TOOLE,)
)
Plaintiff,)
)
vs.) CIVIL ACTION NUMBER
) 2:06-CV-652-VPM
ALFA MUTUAL INSURANCE CO;)
MATTHEW CHUPP;)
DON BRAMLETT, Fictitious Defendants A-F)
)
Defendants.)

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

Witnesses

1. Marie Toole
2. Chris Toole
3. Any person named by the Defendants in their witness disclosure.
4. Any person needed for rebuttal.
5. Any person needed for authentication of any record or document.
6. Any person that maybe revealed through discovery but who is unknown or
unknowable at this time to the Plaintiff.
7. Any person needed as impeachment.
8. Dr. William Hanson-Southern Bone & Joint
9. Dr. Roy Hall-Southern Bone & Joint
10. Mrs. Laurie White-Covenant Rehabilitation
11. Dr. Jeffery Bush

12. Don & Lucinda Bramlett
13. Matthew Chupp
14. Records Clerk-Flowers Hospital
15. Officer Allen Hinson
16. Records Clerk-Southeast Alabama Medical Center
17. Dr. Barry Sadler - Superintendent Eufaula City Schools
18. Mr. John DeLoach, CPA- DeLoach & Wingate
19. Records Clerk-Dothan Surgery
20. Justin Dismukes-Adjuster Precision Body
21. Any person needed to prove any item of damages as already produced to the Defendants.

Documents

1. All documents previously disclosed to Defendant.
2. All documents which would tend to support the Plaintiff's claims for damages that have been or will be made available to the Defendants.

Damages

1. A computation of damages as already disclosed to the Defendants.
2. Any additional computations that may be supported and/or proved by expert testimony.

Insurance Agreement

1. A copy of the under insured motor carrier provision from Alfa Insurance which has already been provided to the Defendant.

(s) Jim S. Calton, Jr.
Jim S. Calton, Jr.
226 East Broad Street
P.O. Box 895
Eufaula, AL 36072-0895
(334) 687-3563

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document by placing same in the U.S.mail, postage paid August 4, 2006 and properly addressed and electronically emailed to.

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This the 16 day of October, 2006.

(s) Jim S. Calton, Jr.
OF COUNSEL